

June 15, 2015

RE: VALIANO SPECIFIC PLAN PDS2013-SP-13-001, PDS2013-GPA-13-001, PDS2013-REZ-13-001, PDS2013-TM-5575, PDS2014-MUP-14-019, PDS2013-STP-13-003, PDS2013-ER-13-08-002 Draft Environmental Impact Report.

Dear Ms. Ehsan,

The mission of The Escondido Creek Conservancy (TECC) is to preserve and restore the Escondido Creek watershed. Our vision is that the watershed will become a model of vibrant urban communities and viable natural ecosystems thriving together. To accomplish this requires sound planning and development sensitive to, and appreciative of, our natural resources. Unfortunately the Valiano project fails this test.

TECC does not dispute the need for more housing. We support, in general, the current County General Plan especially those aspects that came together as a result of many years of careful discussions and are supported by thoughtful studies and community consensus. TECC does oppose sprawl development that produces tremendous negative impacts in our communities and diminishes our quality of life, natural habitats and transportation systems, while increasing the cost of public services. We oppose any project that includes unmitigated impacts.

Biology 4.2.1

Residents adjacent to the Valiano property regularly observe significant wildlife foraging, including deer, bobcats, and coyotes. While much of site is impacted by fallowed agriculture, it still has habitat value, which, left alone or restored, would only improve. We must recognize that keeping common species common is one of the keys to protecting complete ecosystems and preserving threatened and endangered species.

The effects of a project of this size and design would negatively impact adjacent rural properties that are also utilized by both common and threatened species. How will off site impacts be addressed in the Final EIR?

The open spaces proposed on the project site are too narrow, fragmented, and too close to development. They would be so adversely degraded from edge effects that they would not function as viable habitat.

A few of these edge effects, are as follows:

1. Introduction of invasive exotic vegetation inadvertently carried in from bikes, people, animals or spread from backyards or fuel modification zones adjacent to the park wild land. The plant pallet for the development, including pallets for the future homebuyers, should exclude any species listed by Cal-IPC, ASLA or the Los Angeles Regional Invasive Plant Guide as invasive. How will this be addressed in the Final EIR?
2. Higher frequency and severity of fire (fires are a natural process but when too frequent can harm the environment). How will this issue be addressed in the Final EIR?
3. Companion animals (pets) which can act as predators of and competitors with native wildlife, as well as vectors for disease. How will the impacts of free ranging domestic animals be addressed in the Final EIR?
4. Use and creation of undesignated trails can significantly degrade the natural environment. How will the impacts of undesignated trails be addressed in the Final EIR?
5. Influence on earth systems, such as solar radiation, soil richness and erosion, wind damage, hydrologic cycle, and light and water pollution, can affect the natural environment. How does the EIR address these cumulative impacts on the open space and nearby areas?
6. Loss of foraging habitat. Natural predators utilize open areas and old agricultural fields for finding food. How does the EIR propose to mitigate these impacts?
7. Preserved Open Space. TECC has facilitated the acquisition of over 2,000 acres of some of the most bio-diverse, and sensitive habitats, in San Diego County. The closest property, a 500 acre parcel contiguous with over 3,000 additional acres, with sensitive archeological sites as well, is .8 miles from this project. Siting a project with this many residents so near these preserved properties was not anticipated in light of the planning process that resulted in Harmony Grove Village. How will the final EIR address the impacts of the new residents on the nearby existing preserved open space?

Agriculture 4.2.2

This project would result in the loss of approximately 100 acres of agricultural lands. The DIER proposes to place 36+ acres in agricultural preserve at the north end of the project property.

It appears the Valiano agricultural preserve is being set up with the assumption that the agricultural operation will be financially self-sustaining. Given the high cost of water, it is quite likely that the agricultural operations will not be sustainable, leaving the HOA with financial responsibility for long term management.

It should be noted this preserve may not lend itself to conversion to habitat if the HOA determined that management was too intensive since the area is at the north end of the project and as a result is too isolated from a habitat perspective.

How will the final EIR address the likely outcome of the HOA holding an unsustainable agricultural preserve?

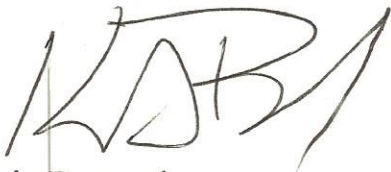
Fire Protection 5.4/Circulation Plan 3.0

Wildland fire is a natural event in chaparral. However the frequency and intensity of fires in San Diego County have increased well beyond the natural cycle due to human activity. This is a threat to the eco-system and to the residents of Eden Valley and surrounding communities and cities.

The document only mentions the Cocos fire of 2014 in passing and does not detail what occurred during that incident. Evacuation out of San Elijo Hills, Elfin Forest, Eden Valley, and Harmony Grove was not possible for many residents creating a significant safety issue (<http://www.utsandiego.com/news/2014/jun/07/san-elijo-traffic-review-cocos-fire-san-marcos/>). Adding yet more housing in a valley with limited two lane roads that connect to level service F intersections in the city of Escondido will only make the situation worse. The Final EIR should address the fire evacuation situation in light of the Cocos Fire experience. How will residents (existing and new) safely flee another inevitable wildfire? How will livestock be evacuated? Shouldn't shelter in place building standards be required not only for the structures in this development, but also for the existing residential structures in Eden Valley?

In conclusion, the project should be built to existing general plan densities if that can be done without significant, unmitigated impacts to the surrounding environment and communities.

Sincerely,

A handwritten signature in black ink, appearing to read 'KB', is written over a horizontal line.

Kevin Barnard
President